

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U. S. District Court No. 11- 11295

CAROLYN E. BLAIR,

Plaintiff

Vs.

CHRISTOPHER LEE, JR.

Defendant

COMPLAINT AND CLAIM FOR JURY TRIAL

1. The Plaintiff, Carolyn E. Blair, resides in Garnet Valley, Pennsylvania and is a citizen of the Commonwealth of Pennsylvania (hereinafter "Blair").
2. The Defendant, Christopher Lee, Jr., resides in Natick, Middlesex County, Massachusetts and is a citizen of the Commonwealth of Massachusetts (hereinafter "Lee").

JURISDICTION

3. This is an action for negligence against Defendant, Lee seeking monetary damages arising out of the personal injuries that Plaintiff, Blair suffered as a result of a motor vehicle accident. The Plaintiff, Blair alleges damages in the amount of \$250,000.00.
4. The jurisdiction of this Court to hear the instant case is found at 28 U.S.C. §1332 Diversity of Citizenship. The amount in controversy exceeds Seventy-Five Thousand (\$75,000.00) Dollars.

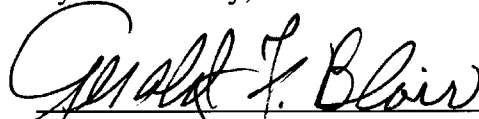
COUNT I

5. On or about July 20, 2009, the Defendant, Lee was operating a motor vehicle on West Goulding Street a/k/a Goulding Street West, a public way in Sherborn, Massachusetts.
6. On or about July 20, 2009, Plaintiff, Blair, was operating a motor vehicle with reasonable due care on South Main Street (a/k/a Route 27), a public way in Sherborn, Massachusetts.
7. On or about July 20, 2009, Defendant, Lee negligently collided with Plaintiff, Blair's automobile at the intersection of South Main Street (a/k/a Route 27) and West Goulding Street (a/k/a Goulding Street West), public ways, in Sherborn, Massachusetts.
8. As a direct and proximate result of Defendant, Lee's negligence, Plaintiff, Blair suffered serious and permanent injuries, disability and suffered great pain and suffering of body and mind and incurred expenses for medical care and treatment in excess of Twelve Thousand (\$12,000.00) Dollars and she incurred lost earning capacity.

WHEREFORE, Plaintiff, Carolyn E. Blair, demands judgment against Defendant, Christopher Lee, Jr. for money damages, together with interest and costs.

PLAINTIFF, CAROLYN E. BLAIR DEMANDS A JURY TRIAL ON ALL ISSUES.

The Plaintiff,
Carolyn E. Blair,
By her Attorney,



Gerald F. Blair B. B.O. No. #044760
The Law Offices of Gerald F. Blair
One Foxhill Drive, Suite 110
Walpole, MA 02081-4406
Tel: (508) 660-9599
Fax: (508) 660-9555
e-mail: gblair@gblairlaw.com